



April 13, 2004

Mr. Clint Seiter
RCRA Enforcement Section
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

Mr. Seiter:

This letter is in response to the letter dated March 18, 2004 requesting additional information concerning the inspection performed on November 17, 2003. Four items have been requested as follows:

1. A waste determination on the liquid underneath the grating in the nickel stripping area.

The low pH solution that had collected underneath the grating was approximately 240 gallons of rinse water that was transferred a 550-gallon tote bin containing a Nitric Acid solution that was hauled off-site for recycling. The solution was hauled on December 12, 2003 under manifest number 23492029 line item 2. A copy of the manifest has been included as Attachment A.

2. A weekly inspection checklist to be used for all waste storage areas and satellite accumulation areas.

A copy of the Daily Hazardous Waste Inspection Log is included as Attachment B.

3. Installation of an internal alarm for the hazardous waste storage area.

A rechargeable air horn has been installed in the hazardous waste storage area along with a pump for recharging the horn. Photographs of the alarm installation and a copy of the packing slip have been included as Attachment C.

4. A contingency plan that includes a list of all emergency equipment, along with each emergency device's location and a brief description of the device.

A copy of a site map indicating the locations of all emergency equipment and lists of personal protective equipment, medical equipment, plant equipment and emergency supplies, where emergency response equipment will be procured, and the types and locations of fire extinguishers have been included as Attachment D.

If you have any questions, comments, or need additional information, please feel free to contact me at (562) 946-5525.

Regards,

Diana F. Crane
Vice President of Quality

Attachments

cc: Richard Kallman, Santa Fe Springs Fire Department

ATTACHMENT A

IN CASE OF EMERGENCY CALL 1-800-424-8802. WITHIN CALIFORNIA, CALL 1-800-852-7550

GENERATOR

FACILITY

UNIFORM HAZARDOUS
WASTE MANIFEST

Generator's US EPA ID No.

Manifest Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.C A D 0 4 3 0 7 9 1 1 0 8 2 0 2 9
of 1

3. Generator's Name and Mailing Address

ASSOCIATED FLATING

500 LAHN STREET

SANTA FE SPRINGS

CA

90670

4. Generator's Phone

562-698-0836

5. Transporter's Company Name

ENVIRONMENTAL RECOVERY SERVICES, INC.

6. US EPA ID Number

C A 0 0 0 0 9 7 0 3 9 2

7. Transporter's Company Name

PHIBRO TECH INC.

8. US EPA ID Number

N J D 9 8 6 6 1 9 3 2 8

9. Designated Facility Name and Site Address

PHIBRO TECH

8851 DICE ROAD

SANTA FE SPRINGS

CA

90670

10. US EPA ID Number

C A D 0 0 0 0 4 0 0 0 2 5

A. State Manifest Document Number

23402029

B. State Generator's ID

C. State Transporter's ID (Reserved)

NA

D. Transporter's Phone

562-698-0836

E. State Transporter's ID (Reserved)

NA

F. Transporter's Phone

562-698-0836

G. State Facility's ID

C A D 0 0 8 4 8 8 0 2 5

H. Facility's Phone

562-698-0836

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

RQ WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S, B,
UN3254, PG I (NITRIC ACID, NICKEL)

002

T P

00550

G

RQ WASTE CORROSIVE LIQUID, ACIDIC, INORGANIC, N.O.S, B,
UN3254, PG I (NITRIC ACID, WATER)

002

T P

00550

G

12. Containers

No.

Type

13. Total

Quantity

14. Unit

Wt/Vol

1. Waste Number

2. State

3. EPA/C

4. Date

5. EPA/C

6. Date

7. EPA/C

8. Date

9. EPA/C

10. Date

11. EPA/C

12. Date

13. EPA/C

14. Date

15. EPA/C

16. Date

17. EPA/C

18. Date

19. EPA/C

20. Date

21. EPA/C

22. Date

23. EPA/C

24. Date

25. EPA/C

26. Date

27. EPA/C

28. Date

29. EPA/C

30. Date

31. EPA/C

32. Date

33. EPA/C

34. Date

35. EPA/C

36. Date

37. EPA/C

38. Date

39. EPA/C

40. Date

41. EPA/C

42. Date

43. EPA/C

44. Date

45. EPA/C

46. Date

47. EPA/C

48. Date

49. EPA/C

50. Date

51. EPA/C

52. Date

53. EPA/C

54. Date

55. EPA/C

56. Date

57. EPA/C

58. Date

59. EPA/C

60. Date

61. EPA/C

62. Date

63. EPA/C

64. Date

65. EPA/C

66. Date

67. EPA/C

68. Date

69. EPA/C

70. Date

16. Special Handling Instructions and Additional Information

EMERGENCY CONTACT ENVSERV 562-698-0836 *P.O. #7886

CALL TO ENVIRONMENTAL RECOVERY SERVICES * USE PROPER SAFETY EQUIPMENT *ERS W.O. #15179 *LX

17. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I am confident.

Printed Name

Diana Crane

Signature

D Crane

Month

Day

Year

1

2

03

17. Transporter's Acknowledgment of Receipt of Materials

Printed Name

David Ayala Beltran

Signature

David Ayala B.

Month

Day

Year

1

2

03

18. Transporter's Acknowledgment of Receipt of Materials

Printed Name

Raminio Martinez

Signature

RM

Month

Day

Year

1

2

03

19. Discrepancy or Other Remarks

Printed Name

Raminio Martinez

Signature

RM

Month

Day

Year

1

2

03

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

DO NOT WRITE BELOW THIS LINE.

Yellow: 1. OF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS.
Generators who submit hazardous waste for transport out of state,
produce completed copy of this copy and send to DTSC within 30 days.

ATTACHMENT B

DAILY HAZARDOUS WASTE INSPECTION LOG

Month/Year: _____

ITEMS TO BE INSPECTED	DATE		DATE		DATE		DATE		DATE		DATE	
	US	S	US	S	US	S	US	S	US	S	US	S
Hazardous waste containers in good condition (no leaks, corrosion).												
Hazardous waste stored in the proper types of containers.												
Hazardous waste containers closed (lids, caps secure).												
Hazardous waste labels properly filled in on all containers.												
Hazardous waste labels readable on all containers.												
No more than 55-gallons accumulated in any satellite location.												
Hazardous wastes stored for less than ninety days.												
Incompatible hazardous wastes properly segregated.												
Proper access to all hazardous waste containers.												
Ignitable materials at least 50-feet from property line.												
Hazardous waste storage area secure from entry or vandalism.												
Amount of rainfall within the last 24-hours (in inches).												
Initials of person performing this inspection.												

S = Satisfactory
US = Unsatisfactory

ALL UNSATISFACTORY ITEMS NOTED MUST BE REPORTED TO EITHER ASSOCIATED PLATING COMPANY'S PRESIDENT OR VICE PRESIDENT OF QUALITY.

For any unsatisfactory item, briefly describe the nature of the problem and the date and nature of its corrective action using first the space below then, if necessary, the back of this sheet.

COMMENTS: _____

ATTACHMENT C



Alarm (rechargeable air horn) installed in the hazardous waste storage area along with a pump to be used for recharging.



ASSOCIATED PLATING CO INC
9636 ANN ST
SANTA FE SPRINGS CA 90670

**YOUR PURCHASE
ORDER NUMBER**
8251

Today's Date: 4/12/04

MCMASTER-CARR
9630 NORWALK BLVD
SANTA FE SPRINGS CA 90670-2932

IF THERE ARE ANY QUESTIONS ABOUT THIS
SHIPMENT CONTACT OUR SALES DEPARTMENT
(562)692-5911

PAGE
1 OF 1
MCM NUMBER
8173496-01

Warehouse Location	McMaster Carr Part Number	FRI Quantity	Item Description	Your Line	Your Order	This Shipment
06-04 03-47	56385 T1	1 EA	RECHARGEABLE HAND-HELD AIR HORN HZ-D 1 LABEL= DRM-D PACK= CO	1	1 EA	1

*OK
4/12/04*

McMASTER-CARR PACKING LIST

ATTACHMENT D

VI. EQUIPMENT LISTS

(6)

Associated Plating Company has emergency response equipment to use in the event of a hazardous materials incident. By on-going examination of procedures, methods, and equipment that will be the best protection of life, property, and the environment, Associated Plating will continue to expand the capabilities of the on-site Emergency Response team.

Inventories of the emergency response equipment will be maintained and updated as additional supplies are added.

On a monthly basis all emergency response equipment will be inspected. Any piece of equipment that has become damaged, worn, passed an expiration date, or missing will be either repaired or replaced as each situation warrants.

A. Personal Protective Equipment

1. Gloves

- Best B14 Cannonball, 14" gauntlet, size 10
- Best 7714R Black Knight, 14" gauntlet, size 10
- Edmont Neoprene, 18 mils, unsupported, flocked, 13" gauntlet, size 10
- Clute Cut Leather Palm, men s

2. Safety Glasses

- Uvex Stylight 9145 (clear), or equivalent

3. Boots

- Bata Boot, polyblend, 16", steel toe
- Miner's Lace Boot, polyblend, steel toe

4. Aprons

- PGI Extra Heavy Weight, coated on both sides, bib style, yellow, 35" X 48", or equivalent

5. Face Masks

- 8500 Non-toxic Particle Mask, 3M, or equivalent
- Moldex 2500 Dust/Mist/Acid Mask, with breathing valve

6. Hearing Protection

- N.R.R. III Tapered Foam Earplugs, noise reduction rating - 31. Zee Medical, or equivalent

7. Face Shields

- Willson Protecto-Shield with clear visor, or equivalent

B. Medical Equipment

1. First Aid Kit (see the "Emergency Equipment Map" in Section V of this plan for the location of the medical equipment)

- Bandages, tape, gauze, scissors, alcohol swabs, antiseptic, tweezers, eye drops, chemical burn neutralization solution, CPR rescue breather shield, thermal blanket, emergency blanket, ammonia inhalants, crutches, rags and wood for setting broken bones or sprains

2. Emergency Oxygen Supply

- Zee Medical, 103 liter canisters (3)

3. Cyanide Antidote Kit

- Available from:

Great Western Chemical
12330 McCann Drive
Santa Fe Springs, CA 90670
(800) 323-4744

C. Plant Equipment and Emergency Response Supplies (see the "Emergency Equipment Map" in Section V of this plan for equipment locations)

1. Safety Showers and Eyewash Stations, plumbed

- Combination Shower/Eyewash Station, yellow bowl, Bradley (in Plating Department)
- Eyewash Station, yellow bowl, Bradley (in the Laboratory)
- Safety Shower, Haws, Model B123H (in the Waste Water Treatment Department)

2. Portable Eyewash Stations, gravity operated

-Fend-all, Portastream, Model 3760 (in the Plating Department and next to the bulk chemical storage area)

3. Fire Extinguishers

-Fire Extinguishers (see "Fire Extinguisher List" at the end of this section)

4. Pumps and Hoses

-Wilden M-8 air diaphragm pump (2)
-Electric drum pump (2)
-Hand siphon pumps (10)
-3/4-inch hose, 150 feet
-2-inch hose, 300 feet
-Water hose, 100 feet (3)
-Air hose, 300 feet

5. Tanks, Barrels, Buckets and Sludge Bags

-1300 gallon tanks (2)
-700 gallon tanks (4)
-250 gallon tanks (2)
-55 gallon barrels, open and closed top (10)
-5 gallon buckets, (10)
-Drum carts, 750 lb. capacity (2)
-Sludge bags, 1 cubic yard capacity (6)

6. Emergency Response and Spill Control Equipment

-Absorbent material, 150 lbs.
-Wheel barrel (1)
-Squeegees (4)
-Brooms (3)
-Mops (2)
-Shovels (5)
-Various lumber, piping (metal and plastic), valves nails, screws, bolts, ties, washers
-Fork Lift, 2000 lb. capacity
-Pallet Jack, 4500 lb. capacity
-Air Compressors (2)
-Perkin Elmer A.A., Model 272
-Welding equipment and accessories
-Propane gas, 499 gallon capacity tank
-Ladders (3)
-Flashlight (1)
-Tyvek Suits
-Potassium carbonate (for neutralization)

7. Power Tools and Hand Tools

- Power tools include; table saw, drill press grinder, Skill Saw, hand drill, saber saw, sanders, band saw, pipe cutter, extension cords
- Hand tools include; screw drivers, hammers, ratchets, wrenches, pliers, wire cutters, hand saws, hatchet saws, crow bars, vices

B. Waste Treatment Chemicals

- Sulfuric Acid, 200-500 gallons
- Liquid Caustic Soda, 300-800 gallons
- Nitric, Hydrochloric, and Phosphoric Acids, 200-400 gallons
- Sodium hypochlorite, bleach (for cyanide treatment), 110 gallons
- Anionic and Cationic Polymers, 30 gallons

D. Procurement List

1. Industrial Pumping and Cleanup

- M.C. Nottingham Company of So. Calif.
1415 East 9th Street
Pomona, CA
(800) 669-2783
24-hour # - (818) 286-3104
- Major Cleanup, Inc.
3150 Maxon Road
El Monte, CA
(818) 459-4150
(800) 669-2783

2. Tank Rentals

- Baker Tanks
19618 South Susana Road
Rancho Dominguez, CA 90221
(800) 922-8404
(310) 763-5872

3. Heavy Equipment Rentals

- PDQ Rentals
10826 South Shoemaker Avenue
Santa Fe Springs, CA
(310) 944-3206

-Able Equipment Rental
13401 East Rosecrans Avenue
Santa Fe Springs, CA
(310) 802-2181

-Reeds Equipment Rentals
620 South Beach Blvd.
La Habra, CA
(310) 691-6724
(310) 697-7122

4. Hardware

-Dromill Lumber, Inc.
11734 East Washington Blvd.
Whittier, CA
(310) 698-9453

-Deal Industrial Hardware and Supply Co.
10004 South Greenleaf Avenue
Santa Fe Springs, CA
(310) 944-6486

-Royal Wholesale
20801 South Annalee Avenue
Carson, CA 90745
(213) 637-6377

-Rancher's Pipe
9429 South Gunn
Whittier, CA
(310) 682-2504

-March Industries
14120 East Gannet
Santa Fe Springs, CA
(310) 921-7066

-Gaines Electric Supply
12131 East Rivera Road
Whittier, CA
(310) 693-4353

-Gelber Industries, Fluid Handling System
12010 Woodruff Avenue, Suite E
Downey, CA 90241
(310) 803-4889

-Valley Flooring
4758 Francis Avenue
Chino, CA 91710
(714) 627-9729

ASSOCIATED PLATING COMPA.

Fire Extinguisher List

No.	Media	Location	Size	Rating
1	Dry Chemical	Racking Department	5 lbs.	A, B, C
2	Carbon dipxide	Maintenance Department	15 lbs.	B, C
3	Dry Chemical	Chemical Storage Room	5 lbs.	A, B, C
4	Dry Chemical	On stairs next to Chem. Room	5 lbs.	A, B, C
5	Dry Chemical	Outside, behind the chiller	10 lbs.	A, B, C
6	Dry Chemical	By the Propane Tank	20 lbs.	A, B, C
7	Dry Chemical	Waste Treatment, by Boiler #2	20 lbs.	A, B, C
8	Dry Chemical	Waste Treatment, by Fuse Room	10 lbs.	A, B, C
9	Dry Chemical	Waste Treatment, by Day Tanks	10 lbs.	A, B, C
10	Dry Chemical	End of General Plating Line	5 lbs.	A, B, C
11	Dry Chemical	Nickel/Tin Deaprtment	10 lbs.	A, B, C
12	Dry Chemical	Behind Barrel Line	5 lbs.	A, B, C
13	Dry Chemical	Shipping/Receiving Department	5 lbs.	A, B, C
14	Dry Chemical	Laboratory	5 lbs.	A, B, C
15	Dry Chemical	Front Office, back hallway	5 lbs.	A, B, C
16	Halon 1211	Sales Office	64 sq ft	B, C
17	Halon 1211	Sales Office	64 sq ft	B, C
18	Halon 1211	Sales Office	64 sq ft	B, C
19	Halon 1211	Racking Department	64 sq ft	B, C
20	Halon 1211	Racking Department	64 sq ft	B, C
21	Halon 1211	Racking Department	64 sq ft	B, C
22	Dry Chemical	Bond Room	5 lbs.	A, B, C
23	Dry Chemical	Storage area above Racking	5 lbs.	A, B, C
24	Dry Chemical	Front Office, top of stairs	5 lbs.	A, B, C

FIRELIST